

EXHIBIT 3

Jason Schneider

From: Ahn, Deana <DeanaAhn@dwt.com>
Sent: Wednesday, February 7, 2024 12:22 AM
To: Jason Schneider
Cc: Crawford, Donna; Nan, Mindy
Subject: RE: Safeway v. Huron Twp - Status Update? (SUB1018097)

Jason:

Amazon stands on its objections as plaintiff's requests are cumulative and overly burdensome. Plaintiff can and should obtain the information sought directly from defendant, which is a party in this suit. Defendant would have the responsive information (e.g., any communications with Amazon and any submissions made by Amazon) and Rule 45 requires that you attempt to obtain materials directly from a party before imposing burdens on a non-party like Amazon. As for plaintiff's requests for traffic studies, if Amazon commissioned any and shared them with defendant, defendant should have them. If Amazon privately conducted traffic studies and did not share them with defendant, such studies would be irrelevant to defendant's decisions.

If you have any questions or would like to discuss further, please let me know. Thanks.

Best,
Deana

Deana Ahn She/Her/Hers
Attorney, Davis Wright Tremaine LLP

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From: Jason Schneider <jschneider@mikecoxlaw.com>
Sent: Friday, February 2, 2024 1:35 PM
To: Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Nan, Mindy <MindyNan@dwt.com>
Subject: RE: Safeway v. Huron Twp - Status Update? (SUB1018097)

[EXTERNAL]

Deana,

Do you have an update on Amazon's response to our subpoena?

Best,
Jason



Jason M. Schneider
The Mike Cox Law Firm, PLLC
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Livonia, MI 48152
jschneider@mikecoxlaw.com

From: Jason Schneider
Sent: Wednesday, January 31, 2024 8:11 PM
To: Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Nan, Mindy <MindyNan@dwt.com>
Subject: RE: Safeway v. Huron Twp - Status Update? (SUB1018097)

Not sure what feedback means. Is someone within Amazon gathering documents? Are you still trying to find the appropriate person at Amazon? Do you have a timeframe?

Best,
Jason



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From: Ahn, Deana <DeanaAhn@dwt.com>
Sent: Monday, January 29, 2024 11:32 PM
To: Jason Schneider <jschneider@mikecoxlaw.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Nan, Mindy <MindyNan@dwt.com>
Subject: RE: Safeway v. Huron Twp - Status Update? (SUB1018097)

Jason:

I'm awaiting feedback from Amazon. I'll revert as soon as I hear back.

Best,
Deana

Deana Ahn She/Her/Hers
Attorney, Davis Wright Tremaine LLP

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From: Jason Schneider <jschneider@mikecoxlaw.com>
Sent: Monday, January 29, 2024 1:48 PM
To: Ahn, Deana <DeanaAhn@dwt.com>
Subject: Safeway v. Huron Twp - Status Update?

[EXTERNAL]

Deana,

Do you have any updates regarding the subpoena to Amazon in the *Safeway v. Huron Twp* matter?

Best,
Jason



Jason M. Schneider
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From: Jason Schneider
Sent: Wednesday, January 24, 2024 3:41 PM
To: deanaahn@dwt.com
Subject: Thank You and Follow-Up

Deana,

Thanks for the call today. I took another look through our documents and confirmed that I do not have a name within Amazon who is/was involved with the distribution centers in Huron Township.

I will give you a call on Monday to check the status on locating the right resource(s) at Amazon.

Please feel free to reach out with any questions in the meantime.

Best,
Jason



Jason M. Schneider
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